ATTORNEYS AT LAW

Proctors in Admiralty

91 W. CHERRY STREET HICKSVILLE, NEW YORK 11801

(516) 931-0064 Telefax (516) 931-4313 USDS SDNY
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HAROLD M. KINGSLEY JOAN S. KINGSLEY STEVEN P. CALKINS

KEVIN T. MURTAGH

November 13, 2007

Hon. Paul A. Crotty United States District Court Southern District of New York 500 Pearl Street, RM 735 New York, NY 10007 Ву Гах

RE: Great American Insurance Co. of New York v.

Advance Ocean Inc., et al.

07 CIV. 6421 (PAC)

Request for extension of time to serve defendants

Our Ref: GA 7921

Hon. Sir:

We represent the plaintiff herein. This action involves damage to cargo during interstate transportation.

A summons and complaint was filed with the Clerk of the Court on July 16, 2007, and an amended complaint was filed on August 22, 2007. Pursuant to Rule 4(m) of the Federal Rules of Civil Procedure, we have 120 days to serve the defendants. The 120 day period expires on today's date, November 13, 2007. All defendants have been served with the exception of Advance Ocean Inc.

We consulted the website for Advance Ocean Inc. which listed an address in Queens County, New York, and an address in Rosemead, California. we served Advance Ocean Inc. in New York with the understanding the New York company and the California company were one in the same. We have since learned they are two independent companies. We are arranging to serve Advanced Ocean Inc. in California now.

Thus, pursuant to Rule 4(m) of the Federal Rules of Civil Procedure, we respectfully request an Order granting the plaintiff an additional readays to serve defendant Advance Ocean Inc.

Thank you.

Respectfully,

KTM/

cc: LANDMAN CORSI BALLAINE & FORD, P.C.

Attorneys for Nippon Yusen Kaisha and NYK Line (North America)

120 Broadway, 27th Floor New York, New York 10271 Attn: Ronald E. Joseph, Esq.

SO ORDERED, NOV 1 3 2007

Paul A. Crotty, U.S.D.J.